369.063613(232)	NORTHERN	RMW/CHA/tgc IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION		
	WES	IEKN	DIVISION	
RONNIE MANNS,)		
	Plaintiff,)		
VS.)	No. 07 CV 50244	
ILLINOIS DEPARTMENT OF)		
CHILDREN AND FAMILY SERVICES, and LUTHERAN SOCIAL SERVICES,)		
	Defendants.)	JURY DEMANDED	
	Defendants.	,		

DEFENDANT'S, LUTHERAN SOCIAL SERVICES, MOTION FOR ENLARGEMENT OF TIME

Defendant, Lutheran Social Services, by its attorneys, and for its motion for enlargement of time to file responsive pleadings to the Plaintiff's, Ronnie Manns, Complaint, states as follows:

- 1. On December 17, 2008, Plaintiff filed his Complaint against the Illinois Department of Children and Family Services and Lutheran Social Services.
- Defendant, Lutheran Social Services, was served with a copy of the Complaint on January 31, 2008.
- 3. The undersigned counsel was just retained to handle this matter on behalf of Defendant, Lutheran Social Services.
- 4. Defendant's, Lutheran Social Services, counsel has yet to meet with its client to discuss the case in any sort of detail.
- 5. Defendant's, Lutheran Social Services, counsel is yet to fully review the file materials in the above-captioned case.

- 6. Defendant, Lutheran Social Services, requests an additional twenty-one (21) days, to and including March 7, 2008, to answer or otherwise plead to the Plaintiff's Complaint. This extension of time will not unduly delay discovery or the progress of this case to trial.
 - 7. This motion is brought in good faith and without prejudice to any party.

WHEREFORE, Defendant, Lutheran Social Services, respectfully requests entry of an Order granting it an extension of time, to and including March 7, 2008, to answer or otherwise plead to the Plaintiff's Complaint, and for any further relief it deems just and appropriate.

/s/Richard M. Waris

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Attorney for Lutheran Social Services

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this Motion for Enlargement of Time was filed electronically this 12th day of February, 2008. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system, fax (with confirmation page attached hereto), hand delivery and/or mail (as indicated below). Parties may access this filing through the Court's electronic system.

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